

UNITED STATES DISTRICT COURT

for the
District of Minnesota

UNITED STATES OF AMERICA,

**FILED UNDER SEAL PURSUANT TO 18 U.S.C.
§ 3509(d)(2) AND LOCAL RULE 49.1(c)(1)(G)**

v.

Case No. 23-MJ-562 (DJF)

CALEB VINCENT MCLAUGHLIN,

a/k/a "JAKE BENSON,"

a/k/a "LIFT11,"

a/k/a "TECH4CM"

CRIMINAL COMPLAINT

I, Matthew Vogel, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT 1 – Production and Attempted Production of Child Pornography

On or about July 31, 2021, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN attempted to, and did employ, use, persuade, induce, entice, and coerce Minor Victim 1, approximately 14 years old, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit, a data file identified as b~EiQSFVhaUndpcjc2aW5HZjRGWGgzczjZOTHoAGgAyAQNIA1AEYAE~v4.mp4, a video approximately nine seconds in duration depicting a closely framed view of Minor Victim 1 masturbating and inserting fingers into her vagina, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, transported in and affecting interstate and foreign commerce, and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT 2 – Child Enticement and Attempted Child Enticement
Using a Facility of Interstate Commerce**

From at least on or about June 9, 2022, and continuing through at least on or about December 15, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN using a facility and means of interstate and foreign commerce, namely, the Internet, did knowingly attempt to and did persuade, induce, entice, and coerce Minor Victim 2, approximately 14 to 15 years old, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, to wit, Criminal Sexual Conduct in the first, second, and third degrees in violation of Minnesota Statute Sections 609.342.1a(f), 609.342.2(b), 609.343.1a(f), 609.343.2, 609.344.1a(b), and 609.344.2, that occurred in and around Ramsey County, Minnesota, and the production of child pornography in violation of Title 18, United States Code, Section 2251(a), all in violation of Title 18 United States Code, Sections 2422(b) and 2427.

COUNT 3 – Receipt and Attempted Receipt of Child Pornography

On or about June 15, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN attempted to and did knowingly receive a visual depiction, to wit, a data file identified as b~EioSFU83SVFLTEoxeHNVHVRnY0twU2dwdRoAGgAiBgj0_suWBjIBA1AEYAE~v4.jpg, an image depicting Minor Victim 2, approximately 14 years old, using her fingers to spread the labia and display the vaginal opening. The visual depiction was received using any means or facility of interstate commerce, including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT 4 – Distribution of Child Pornography

On or about November 23, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN did knowingly distribute a visual depiction, to wit, a data file identified as b~EiQSFxhvZIVtYXB3TTUwbFpSQ29xY2lQWRoAGgAyAX11A1AEYAE~v4.mp4, a video file approximately 39 seconds in duration, depicting MCLAUGHLIN engaged in vaginal intercourse with Minor Victim 3, approximately 15 years old. The visual depiction was distributed using any means or facility of interstate commerce, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

See attached Affidavit, incorporated here

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Complainant's Signature

SUBSCRIBED and SWORN before me by
reliable electronic means (Zoom and email)
pursuant to Fed. R. Crim. P. 41(d)(3)

Date: July 17, 2023

Matthew Vogel, Special Agent
Federal Bureau of Investigation

Printed Name and Title



Judge's Signature

City and State: Minneapolis, MN

The Honorable Dulce J. Foster
United States Magistrate Judge

Printed Name and Title